

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
Digital Television Distributed Transmission	)	
System Technologies	)	MB Docket No. 05-312
	)	

To: The Commission

**REPLY COMMENTS OF READING BROADCASTING, INC.**

Reading Broadcasting, Inc. (“RBI”) hereby submits these reply comments in connection with the Clarification Order and Notice of Proposed Rulemaking (the “NPRM”) in the above-captioned proceeding, which was issued by the Federal Communications Commission (the “Commission” or the “FCC”) on November 4, 2005. RBI is the licensee of WTVE(TV) and WTVE-DT, Reading, Pennsylvania, which are located in the Philadelphia, Pennsylvania designated market area (“DMA”). RBI has devoted substantial time and financial resources into the design of a DTS network for WTVE-DT.

Like the majority of the parties that submitted comments in this proceeding, RBI enthusiastically supports the adoption of rules to authorize the use of DTS technology. RBI also urged the Commission to allow stations utilizing DTS to provide service throughout their designated market area (“DMA”) at the end of the DTV transition. RBI advanced this so-called “DMA approach” because small broadcasters, like RBI, generally operate stations in outlying communities that often are unable to serve the more densely populated portions of their markets due to distance or terrain obstructions. Although

these stations clearly are part of their FCC-defined market, and must compete with those stations that are more centrally located, they are unable to do so effectively due to the inherent geographic limitations of their allotments. Permitting stations that utilize DTS to provide service within their entire FCC-defined market will level the competitive playing field.

RBI submits these reply comments in order to encourage the Commission to reject the proposal advanced by The Association for Maximum Service Television, Inc. (“MSTV”) that would artificially and inequitably limit the benefits of service expansion to large, established broadcasters located in urban areas at the expense of small broadcasters.

Like RBI, MSTV argued that the Commission should not reject out of hand the DMA approach. MSTV Comments at 10. Although MSTV recognizes that the “DMA approach is a more accurate reflection of a station’s local market” (*id.*), MSTV’s proposal that service expansion be permitted only “into traditionally underserved rural areas” (MSTV Comments at 11) suggests that only stations located in urban areas, traditionally the sanctuary of large, established broadcasters, should be permitted to serve that expanded market, while small broadcasters, which typically operate in smaller communities outside of these urban areas, would remain unable to compete with their larger counterparts in these urban areas. The Commission should reject this proposal for what it is – an inequitable double standard that would benefit almost exclusively large, established broadcasters at the expense of small broadcasters, which would be locked into their existing competitive disadvantage.

Instead, the Commission should allow all stations that utilize DTS to provide service within their assigned DMA, at least on a secondary basis, and thereby enable small broadcasters to compete effectively in the markets in which they are located.

Respectfully submitted,

**READING BROADCASTING, INC.**

By: s/George L. Miller

Chapter 11 Trustee  
Reading Broadcasting, Inc.  
1628 John F. Kennedy Blvd  
Suite 950  
Philadelphia, PA 19103  
(215) 561-0950

March 7, 2006